



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

January 20, 2021

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Kathleen M. McKenna
Member of the Firm
d +1.212.969.3130
f 212.969.2900
kmckenna@proskauer.com
www.proskauer.com

Re: Eckhart v. Fox News Network, LLC, and Ed Henry, Civil Case No. 1:20-cv-05593 (RA)

Dear Judge Abrams:

Defendant Fox News Network, LLC, hereby requests the court's permission for a 10-page extension, to allow a total of 20 pages for its Reply Memorandum in support of its Motion to Dismiss Plaintiff Jennifer Eckhart's Third Amended Complaint. The Fox Defendants' Reply brief is due to be filed on Monday, January 25, 2021. The additional pages are necessary to allow Fox News to respond to all of the arguments and contentions contained in Plaintiff's opposition papers, particularly because Plaintiff sought and obtained an extension to 30 pages. We have conferred with counsel for Plaintiff and have their consent to this request.

Respectfully submitted,

/s/ Kathleen M. McKenna

Kathleen M. McKenna, Esq.
Attorneys for Fox News Defendants

cc: All counsel of record (via ECF)